

In re:

Apex Commercial Construction, Inc.,
dba Kuehne Company

Debtor.

Case No. 24-21300
Chapter 11, Subchapter V

**MOTION FOR ORDER FOR EXTENSION OF TIME TO
FILE SCHEDULES AND STATEMENTS**

The above-named Debtor, Apex Commercial Construction, Inc., by its attorneys, Krekeler Law, S.C., hereby moves the Court for an order extending the time period for the Debtor to file schedules and statements. In support of said Motion, Debtor states as follows:

1. On March 19, 2024, an involuntary petition was filed against the Debtor under Chapter 7 of Title 11 of the Bankruptcy Code.
2. On June 14, 2024, Debtor filed a Motion to Convert Involuntary Chapter 7 Case to a Case Under Subchapter V of Chapter 11.
3. On July 12, 2024, the Court entered an Order Converting Case Under Chapter 7 Case to Subchapter V of Chapter 11.
4. The time to file schedules and statements will expire July 26, 2024.
5. For the following reasons the Debtor is unable to file the schedules and statements, required by FRBP 1007 within the prescribed time:
 - a. Debtor is still in the process of gathering the requested information.
 - b. Debtor's President, William "Ken" Buford, has an office manager that assists with all financial records of the Debtor, including but not limited to, maintaining lists of account payables and account receivables.
 - c. The office manager is out of the office until July 31, 2024.
 - d. Krekeler Law, S.C., as Debtor's proposed counsel, requires the assistance of the office manager to obtain all necessary information pertaining to outstanding balances due and owing creditors, including the tax authorities, namely, the Internal Revenue Service,

the Wisconsin Department of Revenue and the Wisconsin Department of Workforce Development.

- e. Debtor's counsel wishes to avoid additional costs to Debtor that would be incurred if incomplete schedules and statements were filed which would require future amendments.
- f. Debtor will require additional time to review and sign the schedules and statements for filing with the Bankruptcy Court.

WHEREFORE, movants request the Court issue an order extending Debtor's time for filing schedules and statements for a period of up to ten (10) days or August 5, 2024.

Dated this 26th day of July, 2024.

KREKELER LAW, S.C.

By: /s/ Kristin J. Sederholm
Kristin J. Sederholm
State Bar No. 1001895
Proposed Counsel for Debtor,
Apex Commercial Construction, Inc.

ADDRESS:

26 Schroeder Court
Suite 300
Madison, WI 53711
(608) 258-8555

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In re:

Apex Commercial Construction, Inc.,
dba Kuehne Company

Case No. 24-21300
Chapter 11

Debtor.

AFFIDAVIT OF MAILING

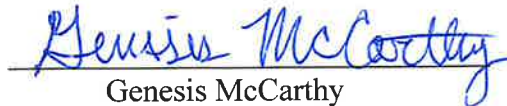
The undersigned, being first duly sworn on oath, deposes and says that on the 26th day of July, 2024, the Motion for Order for Extension of Time to File Schedules and Statements and proposed Order were electronically filed with the Clerk of Court and served upon the following parties using the ECF system:

Office of the United States Trustee
517 East Wisconsin Avenue
Room 430
Milwaukee, WI 53202

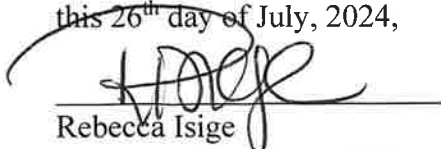
Trustee Iana A. Vladimirova
222 West Washington Avenue, Suite 900
P.O. Box 1784
Madison, WI 53701-1784

The undersigned, being first duly sworn on oath, deposes and says that on the 26th day of July, 2024, the undersigned mailed, properly enclosed in a postpaid envelope, a copy of the Motion for Order for Extension of Time to File Schedules and Statements and proposed Order to:

Apex Commercial Construction, Inc.
6830 South Howell Avenue
Oak Creek, WI 53154-1404


Genesis McCarthy

Subscribed and sworn to before me
this 26th day of July, 2024,


Rebecca Isige

Notary Public, State of Wisconsin
My commission expires: 08/30/2025